

Remarks

Reconsideration is respectfully requested.

Claim Status

Claims 1-20 are pending in the Application.

Claims 1-14 and 16-17 were rejected under 35 U.S.C. § 102(e) as anticipated by Swinton (US 6,398,108).

Claims 15 and 18 were rejected as obvious pursuant to 35 U.S.C. § 103(a) over Swinton in view of Clark (US 6,510,985).

Claims 19-20 have been added. Entry of the amendment is respectfully requested. No new matter has been added. Support for these claims can be found in the Specification and in original claims 1-5 and 18.

The Rejections

As best understood, the Action alleges that Swinton teaches a transport arrangement (T); drive shaft (78/52); drive roller (78A); idle shaft (52/40); idle roller (52/54); and belt (38/40).

Claim 1

Swinton does not anticipate claim 1. Swinton does not teach a transport arrangement that includes "a drive shaft having at least one drive roller thereon." The Office has not shown roller (78A) to be a drive roller. Nor is there any teaching in Swinton that the roller (78A) drives a belt (38/40). Conversely, Swinton teaches (col. 7, lines 24-27) that the roller (78A) merely adds support to *only* the upper belt (38). It follows that the roller (78A) also does not drive the lower belt (40).

Swinton also does not teach that "the drive shaft is operative to drive the idle shaft via the at least one belt." The alleged drive shaft (78) in Swinton does not drive the alleged idle shaft (52) via at least one belt (38/40). Conversely, the alleged drive shaft (78) drives the carriage (R), not the belt (38/40). Thus, the alleged drive shaft (78) cannot drive the alleged idle shaft (52) *via* the belt (38/40). Where does Swinton specifically teach that the alleged idle shaft (52) is driven by the belt (38/40)?

Applicants respectfully submit that the drive device for the belts (38/40) is not shown in Swinton. However, such belt drive device would likely be adjacent to the portions of the belts (38/40) that are located outside of Figures 8 and 9.

As Swinton does not anticipate claim 1, Applicants respectfully request that the rejection be withdrawn.

Claim 18

The Office admits that Swinton does not teach a transport arrangement that includes "at least three belts." Applicants respectfully submit that Swinton lacks more of the recited features and relationships than the Office admits. For example, Swinton also does not (at least) teach or suggest drive rollers having a concave grooved outer circumferential surface configuration; a housing cover that in a closed position is operative to retain the end of a drive shaft in a slotted opening; a spring loaded driven shaft having at least three driven rollers thereon; a first flange attached to at least one first spring; a second flange is attached to at least one second spring; the drive shaft is operative to drive the driven shaft via the belts; and the springs being operative to cause the driven shaft to move away from the drive shaft to maintain the belts in tension.

Clark cannot alleviate the admitted and noted deficiencies of Swinton as he does not teach or suggest the recited features which are not found in Swinton. Clark does not teach or suggest the recited "at least three belts." Where are each of the alleged belts (1, 2, 3) in Clark supported on both a drive roller and a driven roller? Nor has the Action explained how the alleged drive shaft (78) in Swinton could drive a driven shaft via the alleged belts (1, 2, 3) of Clark.

Even if it were somehow possible (which it isn't) for Clark to teach the recited "at least three belts" as alleged, and it were somehow further possible (which it isn't) for Swinton to be modified to include the recited "at least three belts" as alleged, the modified Swinton would still not teach or suggest the previously noted other absent features and relationships. The Office has not established a *prima facie* case of obviousness. The applied prior art is devoid of any such teaching, suggestion, or motivation for combining features of the prior art so as to produce Applicants' recited invention. It would not have been obvious to one having ordinary skill in the art to have modified Swinton with the teaching of Clark as alleged to have produced the recited apparatus.

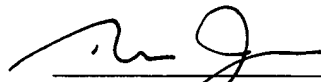
The Dependent Claims

Each of the dependent claims depends directly or indirectly from an independent claim. Thus, it is asserted that the dependent claims are allowable on at least the same basis. Furthermore, each of the dependent claims additionally recites specific features and relationships that patentably distinguish the claimed invention over the applied art. None of the references, taken alone or in combination, discloses or suggests the features and relationships that are specifically recited in the dependent claims. For example, where do the references teach or

suggest the alleged idle shaft (52) being a spring loaded idle shaft having each end flange attached to a spring (e.g., claim 5)? Thus, it is respectfully submitted that the dependent claims are further allowable due to the recitation of such additional features and relationships.

The undersigned is willing to discuss any aspect of the Application by telephone at the Office's convenience.

Respectfully submitted,



Ralph E. Joeke Reg. No. 31,029
WALKER & JOCKE
231 South Broadway
Medina, Ohio 44256
(330) 721-0000